

# EXHIBIT

“A”

Law Offices of Avrum J. Rosen, PLLC  
 38 New Street  
 Huntington, NY 11743

Invoice submitted to:  
 Fraleg Group Inc.

June 28, 2023

In Reference To: Fraleg Group Inc. Chapter 11 case  
 Invoice #11263

Professional Services

	<u>Hrs/Rate</u>	<u>Amount</u>
Alex Tsionis	7.40 400.00/hr	2,960.00
Avrum J. Rosen	132.30 637.35/hr	84,321.00
Everlyn Meade	3.40 150.00/hr	510.00
Nico Pizzo	110.70 325.76/hr	36,061.50
For professional services rendered	253.80	\$123,852.50
Additional Charges :		
\$expense		2,910.18
Total additional charges		\$2,910.18
Total amount of this bill		\$126,762.68
Accounts receivable transactions		
6/15/2022 Payment - thank you		(\$10,738.00)
Total payments and adjustments		(\$10,738.00)

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	<u>Amount</u>
Balance due	<u>\$116,024.68</u>

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Professional Services

			<u>Hrs/Rate</u>	<u>Amount</u>
	<u>Litigation</u>			
9/30/2021	AJR	Multiple calls regarding settlement with lewnder	0.40 620.00/hr	248.00
10/3/2021	AJR	Call wiuth clients on proposed settlement and email David with result.	0.40 620.00/hr	248.00
	AJR	Further settlement communications with David.	0.20 620.00/hr	124.00
6/15/2022	NP	Research multiple Chapter 11 filings law	2.10 325.00/hr	682.50
6/16/2022	AJR	multiple e-mails and telephone calls regarding status of case	1.20 620.00/hr	744.00
6/21/2022	AJR	Emails with opposing counsel	0.10 620.00/hr	62.00
	AJR	review loan documents and research on inflated claim and NJ law.	2.40 620.00/hr	1,488.00
6/22/2022	AJR	research and draft 1007	8.40 620.00/hr	5,208.00
6/23/2022	AJR	research regarding liability on fraud claim	0.60 620.00/hr	372.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/23/2022	AJR	telephone call with client regarding 1007 affidavit	0.40 620.00/hr	248.00
6/27/2022	AJR	e-mails to attorney regarding status of case in response to threats	0.10 620.00/hr	62.00
6/28/2022	AJR	settlement calls with David and follow-up	0.30 620.00/hr	186.00
7/5/2022	AJR	research on adversary proceeding	3.80 620.00/hr	2,356.00
7/6/2022	EM	copy and mail notice and bar date order	0.20 150.00/hr	30.00
7/8/2022	AT	Interoffice meeting with AJR regarding adversary complaint against CAF and Polsinelli	0.50 400.00/hr	200.00
7/11/2022	AJR	interoffice conference with AT regarding adversary proceeding	0.80 620.00/hr	496.00
7/13/2022	AT	Researched causes of action against CAF and Polsinelli	1.60 400.00/hr	640.00
	AJR	receipt and review motion to vacate order in prior case	0.70 620.00/hr	434.00
7/14/2022	AT	Drafted adversary complaint against CAF and Polsinelli	4.10 400.00/hr	1,640.00
7/19/2022	AJR	revise complaint	0.20 620.00/hr	124.00
7/20/2022	AJR	further review complaint and interoffice conference with AT regarding additional causes of action.	0.40 620.00/hr	248.00
	AJR	review second draft of complaint and revise	0.50 620.00/hr	310.00
7/22/2022	AT	Revised adversary complaint against CAF and Polsinelli	1.20 400.00/hr	480.00
7/25/2022	NP	edit and Prepare complaint against creditor and counsel for filing	1.10 325.00/hr	357.50
7/26/2022	EM	copy and mail summons and complaint v CAF et al	0.10 150.00/hr	15.00
	EM	prepare and file affidavit of service for summons and complaint v CAF et al	0.10 150.00/hr	15.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
7/29/2022	NP	Prepare objection to CAF Lender motion to void dismissal	2.30 325.00/hr	747.50
8/1/2022	NP	Draft and Edit objection to CAF Lender motion to void dismissal	3.10 325.00/hr	1,007.50
	AJR	review opposition to reopen and MTLS	0.80 620.00/hr	496.00
8/2/2022	NP	Research objection to CAF Lender motion to void dismissal	2.90 325.00/hr	942.50
	NP	Edit opposition to CAF Lender motion to void dismissal	2.10 325.00/hr	682.50
8/4/2022	AJR	settlement e-mails with opposing counsel	0.10 620.00/hr	62.00
8/5/2022	EM	copy and serve order to show cause motion	0.20 150.00/hr	30.00
	EM	prepare and file affidavit of service for order to show cause motion	0.10 150.00/hr	15.00
8/11/2022	EM	copy and serve CAF void dismissal motion and stay motion	0.30 150.00/hr	45.00
	EM	prepare and file CAF void dismissal motion and stay motion affidavit of service	0.10 150.00/hr	15.00
8/14/2022	AJR	research, draft and file memorandum of law	6.00 620.00/hr	3,720.00
8/15/2022	AJR	e-mails regarding settlement and telephone call with client	0.30 620.00/hr	186.00
8/17/2022	AJR	attend hearing and follow-up with clients and opposing counsel.	1.80 620.00/hr	1,116.00
8/24/2022	NP	Prepare stipulation to extend defendants time to answer complaint in adversary pro	0.70 325.00/hr	227.50
8/25/2022	AJR	research regarding supplemental memorandum of law	4.90 620.00/hr	3,038.00
8/26/2022	NP	Sign and file stipulation to extend defendants time to answer complaint	0.10 325.00/hr	32.50
8/29/2022	AJR	settlement e-mails with David	0.10 620.00/hr	62.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/29/2022	AJR	research on effect of dismissal	0.20 620.00/hr	124.00
	AJR	telephone call with client regarding settlement and refi.	0.20 620.00/hr	124.00
	AJR	further research for brief on all issues	1.70 620.00/hr	1,054.00
8/30/2022	AJR	settlement e-mails with David and client	0.30 620.00/hr	186.00
9/6/2022	AJR	write Reply brief	6.20 620.00/hr	3,844.00
9/7/2022	AJR	Finish reply brief	1.40 620.00/hr	868.00
9/9/2022	EM	copy and serve memorandum of law	0.10 150.00/hr	15.00
	EM	prepare and file affidavit of service for memorandum of law	0.10 150.00/hr	15.00
9/19/2022	AJR	Call with David on settlement.	0.20 620.00/hr	124.00
	NP	Conference call with AJR and CAF counsel	0.50 325.00/hr	162.50
9/20/2022	AJR	Call with client over commitment and settlement	0.30 620.00/hr	186.00
9/22/2022	AJR	settlement discussions with David and client	0.50 620.00/hr	310.00
9/23/2022	AJR	emails and calls with clients regarding commitment and issues with additional collateral.	0.30 620.00/hr	186.00
	AJR	Call with client and email to Nazar	0.30 620.00/hr	186.00
11/17/2022	NP	Draft stipulation to dismiss adversary proceeding	0.70 325.00/hr	227.50
12/9/2022	AJR	Calls and emails regarding status of financing with David and client	0.10 620.00/hr	62.00
1/17/2023	AJR	e-mails to client regarding status	0.10 620.00/hr	62.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/18/2023	AJR	appear on status and multiple telephone calls and e-mails regarding status of case	2.30 620.00/hr	1,426.00
1/19/2023	AJR	e-mails regarding status	0.10 620.00/hr	62.00
	AJR	follow-up e-mails to broker	0.10 620.00/hr	62.00
1/22/2023	AJR	status e-mails to client	0.10 620.00/hr	62.00
1/24/2023	AJR	e-mails regarding payoff	0.10 670.00/hr	67.00
1/26/2023	AJR	e-mails regarding payments to mortgagee	0.10 670.00/hr	67.00
1/30/2023	AJR	e-mails with clients regarding status	0.10 670.00/hr	67.00
1/31/2023	AJR	telephone calls and e-mails regarding status of refinancing	0.20 670.00/hr	134.00
2/3/2023	AJR	e-mails and telephone calls with clients, David and Marc regarding deed and mortgage and e-mail to NK regarding issue	1.90 670.00/hr	1,273.00
2/5/2023	AJR	multiple e-mail and telephone calls regarding notifying parties to what happened	0.10 670.00/hr	67.00
2/8/2023	AJR	e-mails to GR regarding deed	0.20 670.00/hr	134.00
2/21/2023	AJR	transmit status e-mail to David	0.10 670.00/hr	67.00
2/22/2023	AJR	e-mails to David regarding status	0.10 670.00/hr	67.00
2/27/2023	AJR	status e-mails	0.10 670.00/hr	67.00
3/1/2023	AJR	settlement e-mails with David	0.20 670.00/hr	134.00
3/3/2023	AJR	e-mails regarding status and claims objection	0.70 670.00/hr	469.00
3/4/2023	AJR	e-mails to client regarding default	0.40 670.00/hr	268.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
3/7/2023	AJR	multiple e-mails regarding offer to David and follow-up	1.40 670.00/hr	938.00
3/8/2023	AJR	telephone call with client and e-mails regarding results	0.40 670.00/hr	268.00
	AJR	follow-up e-mails and telephone calls regarding status with clients and David.	0.30 670.00/hr	201.00
3/9/2023	AJR	settlement e-mails to David	0.10 670.00/hr	67.00
3/12/2023	AJR	draft file and serve letter with order	0.10 670.00/hr	67.00
3/13/2023	AJR	e-mail to client regarding deed	0.10 670.00/hr	67.00
	AJR	e-mails with GR regarding deed	0.10 670.00/hr	67.00
3/14/2023	AJR	telephone call with DF regarding status and resolution of case	0.50 670.00/hr	335.00
3/20/2023	AJR	e-mails with DF regarding status	0.40 670.00/hr	268.00
3/21/2023	AJR	e-mails and telephone call with client regarding status	0.20 670.00/hr	134.00
3/24/2023	AJR	telephone calls and e-mails regarding payment to lender	0.80 670.00/hr	536.00
3/30/2023	AJR	e-mails to all parties regarding wire not being sent	0.20 670.00/hr	134.00
3/31/2023	AJR	e-mails and telephone calls regarding case status	0.20 670.00/hr	134.00
4/3/2023	AJR	telephone call with clients	0.30 670.00/hr	201.00
4/4/2023	AJR	telephone call and e-mails to client	0.20 670.00/hr	134.00
4/5/2023	AJR	telephone call with David and e-mails regarding settlement	0.60 670.00/hr	402.00
4/6/2023	AJR	telephone call to client regarding status	0.10 670.00/hr	67.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
4/6/2023	AJR	review and revise stipulation	0.40 670.00/hr	268.00
4/7/2023	AJR	review and revise stipulation	0.10 670.00/hr	67.00
4/10/2023	AJR	Finalize stipulation on time to close and send to client for signature.	0.20 670.00/hr	134.00
4/18/2023	AJR	emails regarding funding not happening	0.20 670.00/hr	134.00
5/26/2023	AJR	e-mails regarding status to client	0.10 670.00/hr	67.00
6/28/2023	AJR	E mails to clients regarding lack of response and draft motion to be releived as counsel	1.00 670.00/hr	670.00
	AJR	Finalize fee application	0.60 670.00/hr	402.00
	AJR	Estimated time for hearing on fee application	2.00 670.00/hr	1,340.00
SUBTOTAL:			[ 88.50	48,774.00]
<u>Meetings of Creditors</u>				
6/22/2022	NP	Prepare petition and documents required for IDI and 341 Meeting	0.70 325.00/hr	227.50
7/27/2022	NP	Edit declaration for 341 hearing	0.40 325.00/hr	130.00
7/29/2022	NP	Appear for 341 Meeting	1.30 325.00/hr	422.50
SUBTOTAL:			[ 2.40	780.00]
<u>Plan and Disclosure Statement</u>				
9/7/2022	NP	Prepare Debtor's proposed plan	4.00 325.00/hr	1,300.00
9/12/2022	AJR	emails with clients on status of commitment	0.10 620.00/hr	62.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
9/12/2022	NP	Draft Disclosure Statement	4.10 325.00/hr	1,332.50
9/13/2022	AJR	revise plan and ds and review term sheet.	3.20 620.00/hr	1,984.00
	NP	Edit Disclosure statements and email clients	1.00 325.00/hr	325.00
9/14/2022	AJR	interoffice conference with NP on changes to plan and DS and claims objection	0.30 620.00/hr	186.00
	AJR	interoffice conference with NP on changes to plan and DS and claims objection	0.30 620.00/hr	186.00
	AJR	further revise DS	0.20 620.00/hr	124.00
	AJR	Follow up emails on loan commitment	0.10 620.00/hr	62.00
	NP	Edit Plan and Disclosure statement and send to client for review	1.90 325.00/hr	617.50
9/15/2022	AJR	interoffice conference with NP on changes to plan and DS	0.10 620.00/hr	62.00
	AJR	multiple calls and emails on loan commitment needed for DS	0.30 620.00/hr	186.00
	NP	Draft application to approve DS and schedule a hearing to approve the Plan	3.60 325.00/hr	1,170.00
	NP	Edit and file plan and disclosure statement with exhibits and supporting documents	2.10 325.00/hr	682.50
9/16/2022	NP	Edit and file application approve DS and schedule a hearing to approve the Plan	2.00 325.00/hr	650.00
9/19/2022	AJR	Review and send executed commitment letter	0.10 620.00/hr	62.00
	AJR	Mult emails and review title policy	0.50 620.00/hr	310.00
10/2/2022	AJR	Revise Disclosure Statement	0.80 620.00/hr	496.00
10/4/2022	AJR	Call with David on settlement and revised DS and plan	0.40 620.00/hr	248.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/4/2022	AJR	emails to client regarding settlement	0.20 620.00/hr	124.00
	AJR	Further revise DS and Plan in accord with settlement	2.40 620.00/hr	1,488.00
10/6/2022	AJR	call with attorney for new lender	0.40 620.00/hr	248.00
	AJR	send amended DS to Default to review	0.20 620.00/hr	124.00
10/9/2022	AJR	further email with client on new loan status	0.10 620.00/hr	62.00
10/10/2022	AJR	email to David regarding any changes to DS	0.10 620.00/hr	62.00
10/11/2022	AJR	confirmation call with broker and client on new loan terms	0.70 620.00/hr	434.00
	AJR	Call with client and draft corr to Broker	0.60 620.00/hr	372.00
10/12/2022	AJR	revise disclosure statement order and notice and send to David	1.20 620.00/hr	744.00
10/14/2022	NP	Edit Plan and disclosure statement with CAF proposed edits	2.90 325.00/hr	942.50
10/17/2022	AJR	multiple revisions to sale order, plan and disclosure statement	2.20 620.00/hr	1,364.00
	AJR	finalize all pleadings and file plan	1.80 620.00/hr	1,116.00
10/18/2022	NP	Edit plan and disclosure statement with CAF edits	1.90 325.00/hr	617.50
10/19/2022	AJR	revise all documents and multiple e-mails with DF and client	2.60 620.00/hr	1,612.00
	NP	Edit and prep 363 Sale Order for exhibit to Disclosure statement	0.90 325.00/hr	292.50
	NP	Prepare exhibits to Court Order approving DS per chambers requests	0.30 325.00/hr	97.50
10/20/2022	EM	copy and serve amended disclosure statement	0.10 150.00/hr	15.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
10/20/2022	EM	prepare and file affidavit of service for amended disclosure statement	0.10 150.00/hr	15.00
	NP	Prep and file sale order as Exhibit E to Disclosure Statement	0.20 325.00/hr	65.00
11/1/2022	NP	Prepare plan supplement	0.70 325.00/hr	227.50
	AJR	review US Trustee changes to Plan and DS and make them	0.60 620.00/hr	372.00
11/3/2022	AJR	emails to clients with questions on substituted collateral.	0.30 620.00/hr	186.00
11/7/2022	AJR	emails from client and call on financing	0.30 620.00/hr	186.00
	AJR	Review and revise affidavit in support of confirmation	0.20 620.00/hr	124.00
11/8/2022	AJR	call with US Trustee on Plan supplement	0.10 620.00/hr	62.00
	AJR	emails with NP on commiutment	0.10 620.00/hr	62.00
11/9/2022	AJR	enmail to client regarding status	0.10 620.00/hr	62.00
11/14/2022	AJR	Interoffice conference with NP on confirmation	0.20 620.00/hr	124.00
	NP	Draft Affidavit to confirm Chapter 11 Plan	2.00 325.00/hr	650.00
11/15/2022	AJR	email regarding confirmation	0.10 620.00/hr	62.00
11/16/2022	AJR	email with clients regarding confirmation	0.10 620.00/hr	62.00
	AJR	attend confirmation hearing and status	2.50 620.00/hr	1,550.00
	NP	Appear for status conference and plan and DS hearing	1.00 325.00/hr	325.00
11/17/2022	NP	Draft Confirmation Order	1.90 325.00/hr	617.50

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			<u>Hrs/Rate</u>	<u>Amount</u>
11/18/2022	NP	Update confirmation order with UST edits	0.30 325.00/hr	97.50
11/21/2022	NP	Emails creditors and UST regarding plan confirmation order	0.10 325.00/hr	32.50
11/22/2022	NP	Prepare and upload plan confirmation Order	0.30 325.00/hr	97.50
11/28/2022	AJR	follow up with client and David on status of refi.	0.10 620.00/hr	62.00
12/1/2022	AJR	email to chambers on Confirmation order	0.10 620.00/hr	62.00
	AJR	Status email to lender's counsel	0.10 620.00/hr	62.00
12/2/2022	AJR	email to client regarding status on refinances	0.10 620.00/hr	62.00
12/3/2022	NP	Edit Plan and Bidding terms and send to CAF counsel	1.00 325.00/hr	325.00
12/8/2022	AJR	emails over status of financing for plan	0.10 620.00/hr	62.00
12/13/2022	AJR	call with mortgage broker and emails to David regarding same.	0.40 620.00/hr	248.00
12/14/2022	AJR	emails over new financing	0.40 620.00/hr	248.00
12/19/2022	AJR	Forward confirmation order to all parties	0.10 620.00/hr	62.00
12/20/2022	EM	copy and serve notice of effective date	0.10 150.00/hr	15.00
	EM	prepare and file affidavit of service for notice of effective date	0.10 150.00/hr	15.00
1/5/2023	AJR	e-mails with David Ferguson regarding status	0.60 620.00/hr	372.00
1/6/2023	AJR	e-mails regarding status of financing	0.10 620.00/hr	62.00
1/9/2023	AJR	e-mails to broker regarding status	0.10 620.00/hr	62.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/18/2023	NP	Appear for post confirmation hearing	0.60 325.00/hr	195.00
2/17/2023	AJR	e-mails from David regarding status of funding purchase	0.10 670.00/hr	67.00
3/14/2023	AJR	telephone call and e-mails from client regarding status	0.20 670.00/hr	134.00
3/27/2023	AJR	telephone call and e-mails regarding wire and calculations of amount due	0.40 670.00/hr	268.00
SUBTOTAL:			[ 59.60	27,123.00]
<u>Relief from Stay Proceedings</u>				
8/1/2022	NP	Draft motion that CAF Lender violated the automatic stay	4.40 325.00/hr	1,430.00
8/2/2022	AJR	research effect of dismissal of orders in case	0.40 620.00/hr	248.00
8/3/2022	NP	Edit debtor's application to enforce the automatic stay	0.70 325.00/hr	227.50
	AJR	review stay violation motion	0.40 620.00/hr	248.00
8/4/2022	NP	Draft expedited Hearing application, affidavit and order to violation of stay motion	2.30 325.00/hr	747.50
	NP	Prepare and file application seeking to enforce the automatic stay with expedited hearing	0.90 325.00/hr	292.50
	AJR	research motion to lift stay	0.30 620.00/hr	186.00
8/8/2022	NP	Prepare opposition to the Lender motion to lift the stay	3.30 325.00/hr	1,072.50
8/9/2022	NP	Research lift stay law on multiple filing	2.10 325.00/hr	682.50
	NP	Edit opposition to the Lender's motion to lift the stay	2.00 325.00/hr	650.00
	AJR	interoffice conference with NP regarding opposition to lift stay and revise same	0.60 620.00/hr	372.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/29/2022	NP	Research res judicata on lift stay issue	2.40 325.00/hr	780.00
10/12/2022	NP	Appear for hearing on the stay motions	2.00 325.00/hr	650.00
11/9/2022	AJR	Appear on Motion to lift stay	0.50 620.00/hr	310.00
2/10/2023	AJR	review motion to lift stay	0.30 670.00/hr	201.00
	AJR	transmit motion to lift stay to clients	0.10 670.00/hr	67.00
3/1/2023	AJR	draft opposition to motion to lift stay	5.40 670.00/hr	3,618.00
3/8/2023	AJR	attend lift stay hearing	1.80 670.00/hr	1,206.00
SUBTOTAL:			[ 29.90	12,988.50]
<u>Asset Disposition</u>				
8/19/2022	AJR	settlement calls	0.30 620.00/hr	186.00
1/10/2023	AJR	e-mail to client and mortgage broker	0.10 620.00/hr	62.00
1/11/2023	AJR	telephone call to mortgage broker and e-mail regarding refinance	0.60 620.00/hr	372.00
	AJR	telephone call and e-mails regarding finance	0.10 620.00/hr	62.00
1/12/2023	AJR	telephone call with client and e-mail to David regarding status	0.60 620.00/hr	372.00
1/13/2023	AJR	e-mails regarding status of refinance	0.10 620.00/hr	62.00
1/17/2023	AJR	forward potential purchaser to MY and e-mails with MY regarding same	0.10 620.00/hr	62.00
1/20/2023	AJR	e-mails with MY regarding sale process	0.20 620.00/hr	124.00



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			<u>Hrs/Rate</u>	<u>Amount</u>
1/20/2023	AJR	e-mails to David regarding status	0.20 620.00/hr	124.00
1/23/2023	AJR	e-mails and telephone calls regarding refinance	0.20 620.00/hr	124.00
2/1/2023	AJR	telephone calls and e-mails regarding lender	0.30 670.00/hr	201.00
2/2/2023	AJR	review payoff and transmit to client	0.20 670.00/hr	134.00
	AJR	e-mails with MY regarding auction and telephone calls with David regarding sale process and deed and mortgage	0.90 670.00/hr	603.00
2/7/2023	AJR	telephone call with MY regarding offer	0.30 670.00/hr	201.00
2/10/2023	AJR	telephone call with GR regarding mortgage	0.40 670.00/hr	268.00
2/12/2023	AJR	e-mails to clients regarding plans for MY	0.10 670.00/hr	67.00
2/13/2023	AJR	multiple e-mails with client regarding sale	0.40 670.00/hr	268.00
2/15/2023	AJR	attend hearing and follow up with clients and all parties	3.00 670.00/hr	2,010.00
2/16/2023	AJR	telephone call with broker and clients	0.40 670.00/hr	268.00
	AJR	e-mails with clients regarding status	0.30 670.00/hr	201.00
	AJR	telephone call with mortgage broker regarding refinancing	0.20 670.00/hr	134.00
2/18/2023	AJR	e-mails regarding potential purchaser from MY	0.10 670.00/hr	67.00
2/21/2023	AJR	e-mails with broker	0.20 670.00/hr	134.00
	AJR	e-mails with Glen regarding potential sale	0.10 670.00/hr	67.00
2/22/2023	AJR	telephone call with new lender and e-mails with David regarding same	1.00 670.00/hr	670.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
2/24/2023	AJR	e-mails with GP regarding closings	0.10 670.00/hr	67.00
	AJR	settlement e-mails to David	0.20 670.00/hr	134.00
3/2/2023	AJR	revise sale order and transmit	0.90 670.00/hr	603.00
3/6/2023	NP	Prepare and file the notice of settled order to revised 363 order	1.10 325.00/hr	357.50
	EM	copy and serve notice of 363 settlement order	0.20 150.00/hr	30.00
	EM	prepare and file affidavit of service for notice of 363 settlement order	0.10 150.00/hr	15.00
	AJR	multiple e-mails and telephone calls to client regarding status and transfer of deed	0.30 670.00/hr	201.00
3/10/2023	AJR	telephone calls and e-mails regarding sale	0.30 670.00/hr	201.00
3/15/2023	AJR	telephone calls and e-mails regarding wire	0.40 670.00/hr	268.00
3/21/2023	AJR	telephone calls with MY regarding potential sale	0.20 670.00/hr	134.00
4/10/2023	AJR	Calls to broker on refi and client	0.20 670.00/hr	134.00
	AJR	email with Default regarding sale of vacant lot.	0.10 670.00/hr	67.00
5/19/2023	AJR	e-mails to David regarding status	0.10 670.00/hr	67.00
6/1/2023	AJR	emails on different ways to finish case.	0.10 670.00/hr	67.00
6/6/2023	AJR	emails as to status of funding plan.	0.10 670.00/hr	67.00
6/13/2023	AJR	emails regarding status of closing	0.10 670.00/hr	67.00
6/15/2023	AJR	Emails to clients regarding status of closing on refi	0.20 670.00/hr	134.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/15/2023	AJR	emails to client regarding status of closing	0.10 670.00/hr	67.00
6/16/2023	AJR	email regarding issue with closing.	0.10 670.00/hr	67.00
6/17/2023	AJR	Email to clientrs regarding status.	0.10 670.00/hr	67.00
	AJR	email exchange with clients regarding difficulty with refi of non estate property to fund plan.	0.10 670.00/hr	67.00
6/23/2023	AJR	Email to clients regarding options for case if they continue to not communicate with counsel and fail to deposit fund to confirm.	0.20 670.00/hr	134.00
SUBTOTAL:			[ 15.70	9,858.50]
<u>Case Administration</u>				
6/16/2022	NP	Draft petition and review filings	4.20 325.00/hr	1,365.00
	NP	Draft corporate disclosure and resolution documents	1.10 325.00/hr	357.50
6/17/2022	NP	Edit petition and corporate disclosure and resolution	1.80 325.00/hr	585.00
6/21/2022	NP	Phone call with principals of the Debtor regarding case	0.50 325.00/hr	162.50
	AJR	zoom with clients on status and and case management	0.60 620.00/hr	372.00
6/22/2022	NP	Email exhcange with Debtor and UST regarding IDI, 341 meeting and documents	0.30 325.00/hr	97.50
	NP	Edit 1007 affidavit	1.20 325.00/hr	390.00
6/23/2022	NP	Edit 1007 affidavit	0.80 325.00/hr	260.00
	AJR	revisions to 1007 affidavit and transmit to client for signature	1.60 620.00/hr	992.00
	AJR	file 1007 affidavit with exhibits and serve	0.20 620.00/hr	124.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
6/27/2022	NP	Draft bar date motion with notice and Order	1.00 325.00/hr	325.00
6/28/2022	NP	Compile IDI documents and request document from Andy	0.70 325.00/hr	227.50
	NP	Prep and file bar date motion	0.60 325.00/hr	195.00
	EM	copy and mail petition and schedules	0.10 150.00/hr	15.00
6/29/2022	NP	Prep and send IDI documents to the UST	0.60 325.00/hr	195.00
7/5/2022	NP	Appear for IDI with Debtor	0.90 325.00/hr	292.50
	NP	Phone call with Debtors regarding payoff value of mortgage, and Draft letter noting the value of the payoff in writing	1.00 325.00/hr	325.00
7/6/2022	EM	prepare and file affidavit of service for notice and bar date order	0.20 150.00/hr	30.00
7/8/2022	EM	copy and mail notice and bar date order	0.10 150.00/hr	15.00
	EM	prepare and file affidavit of service for notice and bar date order	0.10 150.00/hr	15.00
8/3/2022	NP	Appear for Status conference	0.90 325.00/hr	292.50
	AJR	appear on prepare for status hearing and appear on same	0.90 620.00/hr	558.00
8/5/2022	AJR	e-mails to NP regarding documents	0.10 620.00/hr	62.00
8/10/2022	NP	Prepare amended Schedule A and send to client for review	0.60 325.00/hr	195.00
8/11/2022	NP	Prepare MOR	0.60 325.00/hr	195.00
	EM	copy and serve amended schedules	0.10 150.00/hr	15.00
	EM	prepare and file amended schedules affidavit of service	0.10 150.00/hr	15.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
8/17/2022	NP	Appear for status conference and motions	1.60 325.00/hr	520.00
8/23/2022	AJR	e-mails regarding IRS request for tax returns and petition	0.10 620.00/hr	62.00
8/29/2022	NP	Prepare letter and send tax returns to IRS	0.10 325.00/hr	32.50
9/20/2022	NP	Prepare Monthly Operating Report	0.90 325.00/hr	292.50
9/23/2022	NP	Prepare and file MOR	0.90 325.00/hr	292.50
10/12/2022	AJR	appear at status conference	1.90 620.00/hr	1,178.00
10/14/2022	NP	Prepare monthly operating report	0.30 325.00/hr	97.50
11/27/2022	AJR	conference regarding status of case	0.30 620.00/hr	186.00
1/18/2023	NP	Prepar MOR pre confirmation	0.70 325.00/hr	227.50
2/2/2023	AJR	e-mails regarding status	0.10 670.00/hr	67.00
	AJR	e-mails regarding status	0.10 670.00/hr	67.00
2/7/2023	AJR	telephone call with DF and review documents	1.00 670.00/hr	670.00
	AJR	further review documents and e-mail to client	1.30 670.00/hr	871.00
2/8/2023	AJR	telephone calls and e-mails with client regarding status	0.30 670.00/hr	201.00
2/9/2023	AJR	draft status letters with client and MY	3.60 670.00/hr	2,412.00
2/15/2023	NP	Appear for post confirmation hearing	0.60 325.00/hr	195.00
3/24/2023	AJR	status e-mail to David	0.20 670.00/hr	134.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/28/2023	AJR	e-mails regarding wire	0.20 670.00/hr	134.00
3/29/2023	AJR	e-mails regarding status of wire	0.30 670.00/hr	201.00
4/3/2023	AJR	telephone call with client	0.10 670.00/hr	67.00
4/10/2023	NP	Send stipulation to client and prepare for filing	0.50 325.00/hr	162.50
4/12/2023	AJR	Attend Status and follow up.	0.80 670.00/hr	536.00
5/2/2023	AJR	e-mails to clients regarding next steps	0.40 670.00/hr	268.00
5/10/2023	AJR	e-mails to client regarding status of property	0.30 670.00/hr	201.00
SUBTOTAL:			[ 37.50	16,748.00]
<u>Claims Administration and Objections</u>				
9/8/2022	NP	Edit and prepare for filing the supplemental reply memo of law on the motions	1.60 325.00/hr	520.00
9/9/2022	NP	Edit supplemental reply memo of law on the motions and prepare exhibit for filing	1.60 325.00/hr	520.00
9/16/2022	NP	Review POCs and send to client to review	0.60 325.00/hr	195.00
11/29/2022	NP	Emails with clients regarding terms of settlement with CAF	0.20 325.00/hr	65.00
12/13/2022	NP	Draft objection to NYCDOF claim	2.00 325.00/hr	650.00
12/15/2022	EM	copy and serve motion to reduce claim	0.30 150.00/hr	45.00
	EM	prepare and file affidavit of service for motion to reduce claim	0.10 150.00/hr	15.00
1/3/2023	NP	Emails with NYC tax regarding claim objection	0.20 325.00/hr	65.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
1/3/2023	AJR	telephone call with Hugh Schull regarding claim objection and follow-up	0.40 620.00/hr	248.00
1/10/2023	NP	Email NYCDOF to extend time to respond to claim objection	0.10 325.00/hr	32.50
4/10/2023	AJR	emails with HS and and emails to client regarding NYC claim Objection	0.10 670.00/hr	67.00
SUBTOTAL:			[ 7.20	2,422.50]
<u>Fee/Employment Applications</u>				
7/5/2022	NP	Prepare AJR retention Application	1.90 325.00/hr	617.50
7/13/2022	AJR	revise retention and submit	0.40 620.00/hr	248.00
7/25/2022	NP	Amended the disclosure of compensation and file	0.30 325.00/hr	97.50
12/12/2022	NP	Prepare MYC retention application	2.10 325.00/hr	682.50
12/15/2022	NP	Circulate MYC retention application for review	0.30 325.00/hr	97.50
12/19/2022	NP	Prepare and send retention application to Debtor for review and signing	0.70 325.00/hr	227.50
12/20/2022	NP	File retention application for MYC	0.70 325.00/hr	227.50
12/21/2022	EM	prepare and file affidavit of service for motion to employ MYC	0.10 150.00/hr	15.00
	EM	copy and serve motion to employ MYC	0.20 150.00/hr	30.00
2/9/2023	AJR	e-mails with MY regarding retention	0.10 670.00/hr	67.00
2/12/2023	AJR	e-mails regarding retention	0.30 670.00/hr	201.00
2/17/2023	AJR	transmit MYC retention order	0.10 670.00/hr	67.00

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			<u>Hrs/Rate</u>	<u>Amount</u>
3/13/2023	NP	Draft AJR Fee Application	2.80 325.00/hr	910.00
	AJR	draft motion to be relieved as counsel	0.40 670.00/hr	268.00
6/23/2023	NP	Update and edit first and final fee applications	0.70 395.00/hr	276.50
6/24/2023	AJR	review and revise fee application.	1.00 670.00/hr	670.00
		SUBTOTAL:	[ 12.10	4,702.50]
		<u>Fee/Employment Objections</u>		
6/14/2023	NP	Appear at status hearing and Claim objection hearing	0.50 395.00/hr	197.50
		SUBTOTAL:	[ 0.50	197.50]
		<u>Financing</u>		
10/7/2021	AJR	follow up email on new loan	0.10 620.00/hr	62.00
12/12/2022	AJR	follow up on status with all parties	0.10 620.00/hr	62.00
3/1/2023	AJR	e-mails and telephone calls regarding funding	0.20 670.00/hr	134.00
		SUBTOTAL:	[ 0.40	258.00]
		For professional services rendered	253.80	\$123,852.50
		Additional Charges :		
		<u>Litigation</u>		
7/6/2022		photocopy charge to copy notice and bar date order; 162 pages @ \$.10 per page		16.20
		postage charge to mail notice and bar date order		6.57
7/8/2022		photocopy charge to copy notice and bar date order;18 pages @ \$.10 per page		1.80



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	<u>Amount</u>
7/22/2022 PACER charge for the months of April, May and June	22.10
7/25/2022 Adv Proceeding Filing fee	350.00
7/26/2022 photocopy charge to copy summons and complaint v CAF et al; 243 pages @ \$.10 per page	24.30
postage charge to mail summons and complaint v CAF et al	44.12
8/5/2022 photocopy charge to copy order to show cause order; 27 pages @ \$.10 per page	2.70
photocopy charge to copy order to show cause motion; 117 pages @ \$.10 per page	11.70
postage charge to mail order to show cause motion	47.00
8/11/2022 photocopy charge to copy objection to CAF void dismissal motion; 116 pages @ \$.10 per page	11.60
photocopy charge to copy objection to CAF stay motion; 388 pages @ \$.10 per page	38.80
postage charge to mail objection to CAF stay motion	15.50
9/9/2022 photocopy charge to copy memorandum of law; 126 pages @ \$.10 per page	12.60
postage charge to mail memorandum of law	4.86
9/30/2022 PACER charges for the months of July, August and September	22.70
11/2/2022 Fedex charge for overnight mail for scheduling order 8/5	233.51
12/20/2022 photocopy charge to copy notice of effective date; 30 pages @ \$.10 per page	3.00
postage charge to mail notice of effective date	8.55
 SUBTOTAL:	 [ 877.61]
<u>Plan and Disclosure Statement</u>	
10/20/2022 photocopy charge to copy amended disclosure statement; 756 pages @ \$.10 per page	75.60
postage charge to mail amended disclosure statement	23.52
 SUBTOTAL:	 [ 99.12]
<u>Asset Disposition</u>	
3/6/2023 photocopy charge to copy notice of 363 settlement order; 416 pages @ \$.10 per page	41.60
postage charge to mail notice of 363 settlement order	17.28

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	<u>Amount</u>
SUBTOTAL:	[ 58.88]
<u>Case Administration</u>	
6/17/2022 Court filing fee	1,738.00
6/30/2022 photocopy charge to copy petition and schedules; 62 pages @ \$.10 per page	6.20
postage charge to mail petition and schedules	2.69
8/11/2022 photocopy charge to copy amended schedules; 384 pages @ \$.10 per page	38.40
postage charge to mail amended schedules	6.48
SUBTOTAL:	[ 1,791.77]
<u>Claims Administration and Objections</u>	
12/15/2022 photocopy charge to copy motion to reduce claim; 315 pages @ \$.10 per page	31.50
postage charge to mail motion to reduce claim	12.15
SUBTOTAL:	[ 43.65]
<u>Fee/Employment Applications</u>	
12/21/2022 photocopy charge to copy motion to employ MYC; 270 pages @ \$.10 per page	27.00
postage charge to mail motion to employ MYC	12.15
SUBTOTAL:	[ 39.15]
Total additional charges	\$2,910.18
Total amount of this bill	\$126,762.68
Accounts receivable transactions	
6/15/2022 Payment - thank you	(\$10,738.00)
Total payments and adjustments	(\$10,738.00)
Balance due	\$116,024.68